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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON - PORTLAND DIVISION

**RUSSELL PITKIN and MARY PITKIN, Co-
Personal Representatives of the Estate of
MADALINE PITKIN, Deceased,**

Plaintiffs,

v.

Case No. 3:16-cv-02235-AA

**NOTICE TO CLERK OF
COURT OF DEFENDANTS'
OFFER AND PLAINTIFFS'
ACCEPTANCE OF
DEFENDANTS' OFFER
OF JUDGMENT AND REQUEST
FOR ENTRY OF JUDGMENT**

**CORIZON HEALTH, INC., a
Delaware Corporation; WASHINGTON
COUNTY, a government body in the State of
Oregon; JOSEPH MCCARTHY, MD, an
individual; COLIN STORZ, an individual;
LESLIE O'NEIL, an individual; CJ
BUCHANAN, an individual; LOUISA
DURU, an individual; MOLLY JOHNSON,
an individual; COURTNEY NYMAN,**

an individual; **JOHN DOES 1-10**, as they relate to Corizon Health, Inc. only; and **JANE DOES 1-10**, as they relate to Corizon Health, Inc. only,

Defendants.

TO: Clerk of the Court.

Pursuant to FRCP 68, on November 30, 2018, Defendants Corizon Health, Inc., Washington County, Joseph McCarthy, M.D., Colin Storz, Leslie O'Neil, CJ Buchanan, Louisa Duru, Molly Johnson, and Courtney Nyman served Plaintiffs Russell Pitkin and Mary Pitkin with an Offer of Judgment allowing judgment be entered against Defendants Corizon Health, Inc., Washington County, Joseph McCarthy, M.D., Colin Storz, Leslie O'Neil, CJ Buchanan, Louisa Duru, Molly Johnson, and Courtney Nyman, in favor of plaintiffs in the amount of Ten Million Dollars (\$10,000,000). This amount is inclusive of attorney fees and costs, and is for all claims asserted in the First Amended Complaint. On December 5, 2018, Plaintiffs Russell Pitkin and Mary Pitkin accepted the Offer of Judgment by service on defendants of a Notice of Acceptance of Defendants' Offer of Judgment. Attached hereto and by reference incorporated herein as Exhibits A and B, respectively, are copies of Defendants' Offer of Judgment and Plaintiffs' Notice of Acceptance of Defendants' Offer of Judgment, with proof of service.

Pursuant to FRCP 68(a), Plaintiffs Russell Pitkin and Mary Pitkin request the Clerk of the Court enter judgment in favor of Plaintiffs Russell Pitkin and Mary Pitkin and against Defendants Corizon Health, Inc., Washington County, Joseph McCarthy, M.D., Colin Storz, Leslie O'Neil, CJ Buchanan, Louisa Duru, Molly Johnson, and Courtney Nyman, in the amount

of Ten Million Dollars (\$10,000,000).

Dated this 5th day of December, 2018.

TIM JONES PC

By: s/ Timothy J. Jones
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Of Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing NOTICE TO CLERK OF COURT OF DEFENDANTS' OFFER AND PLAINTIFFS' ACCEPTANCE OF DEFENDANTS' OFFER OF JUDGMENT AND REQUEST FOR ENTRY OF JUDGMENT on the following attorneys on the date noted below via the following method:

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Of Attorneys for Defendants Corizon Health, Inc., Joseph McCarthy, M.D., Colin Storz, Leslie O'Neil, CJ Buchanan, Louisa Duru, Molly Johnson and Courtney Nyman

Method: CM/ECF Electronic Service and US Postal Service, First-Class.

Dated this 5th day of December, 2018.

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